

Department of Environment and Science

Mineral Business Centre

PO Box 7230

Cairns QLD 4870

14 October 2021

Att Ms Shanna Toe and Mr Giles Bezzina

Dear Shanna and Giles,

Graymont NSW) Pty Ltd Marmor Quarry PRCP

I am pleased to submit our PRCP for the Marmor Quarry on behalf of Graymont Australia.

Together with the plan and rehabilitation schedule, is a table, referencing amendments and additional information requested following our previous application which was deemed; "Not properly made."

I would like to recognise the assistance provided by departmental staff, in particular, yourselves and Mr Chris Wake for the guidance provided during the course of making the application, which is greatly appreciated.

Should further information or clarification be required, please don't hesitate to make contact with me or Donald Cheong.

Yours sincerely,



Tom Ord
Health, Safety and Environment Manager, Northern – Asia Pacific
GRAYMONT

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Attachments:

1. Reference Table of Changes to the First Application
2. PRCP Application
3. Rehabilitation Schedule

Notice Ref.	Notice comments	Graymont Response
3 bullet 1	The proposed PRC plan does not include a statement of the extent of consistency between the proposed post-mining land uses (PMLU) and any strategies or plans for the land of a local government, the State or the Commonwealth.	Statements regarding the consistency between the proposed post-mining land uses (PMLU) and any strategies or plans is provided Section 3.3.1.1 of the PRCP.
3 bullet 2	The proposed PRC plan does not adequately, for each proposed PMLU for land, state the proposed methods or techniques for rehabilitating the land to a stable condition in a way that supports rehabilitation milestones under the proposed PRCP schedule.	Further details of the rehabilitation strategy are provided in Section 3.5. Subsections 3.5.1, 3.5.2, 3.5.3, 3.5.4, 3.5.6, 3.5.7, 3.5.8, 3.5.9, 3.5.11, 3.5.12 and 3.5.13 have been added or substantially expanded and amended to support the achievement of rehabilitation milestones.
3 bullet 3	The proposed PRC plan does not identify the risks of a stable condition for land not being achieved and how the applicant intends to manage or minimise the risks. The risk assessment provided assesses the risks of achieving the PMLU only.	The risk assessment in Section 3.6 has been updated to address stability risk.
PRCP guideline section 3.1 Baseline	Baseline information Groundwater levels and properties	A groundwater hydrology assessment including information of groundwater levels, and quality is provided in Section 3.1.5 (and all subsections).
	Pre-mining land use	As operations at the site began in 1904, there are no records of former land use at the site prior to mining disturbance. Therefore, published land use information for the area has been reviewed to provide the likely baseline land use associated with the site pre-mining. This is provided in Section 3.1.6.
	Soil types, properties and productivity	The <i>Land Systems of the Dawson-Fitzroy area, Queensland</i> published by CSIRO has been reviewed to provide information on soil types, land characteristics (in terms of agricultural potential). This information is provided in Section 3.1.7. Further comments on land quality with respect to agricultural potential described in the are also provided in Section 3.3.1.1.
	Land stability (pre-existing land degradation/erosion and predisposition to ongoing stability issues)	This has been assessed based on the soil types mapped for the area as well as the quality of properties of the topsoils stockpiled on-site. It is provided in Section 3.1.7.1.

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	Fauna presence and populations	Information derived from a desktop study of the fauna and flora populations on and around the site are provided in Section 3.1.8.
	Identification of underlying landholders	Information of the underlying landholders is provide in Section 3.1.9.1
PRCP guideline section 3.1	Spatial data Spatial information provided with the application did not meet the requirements of the Guideline - Spatial information submission Environmental Protection Act 1994 (ESR/2018/4337). Spatial information should be submitted as a zipfile with all of the required file types including a metadata file in accordance with Table 2 of the Guideline. Spatial information is to be submitted to spatialsubmit@des.qld.gov.au	Metadata is provided with the spatial data.
	The following spatial information has not been provided with the application: any sensitive receptors which may include nearby residences and/or environmentally sensitive areas	Sensitive receptor data is provided with the spatial data and described in Section 3.1.10
	a breakdown of the nominated rehabilitation areas within the resource tenure that corresponds with the proposed PRCP schedule	This is provided in Section 3.1.11 and Figure 9. The data is provided spatially.
PRCP Guideline Section 3.5	A community consultation register and a community consultation plan	Information on the development of the community engagement plan and community engagement register has been provided Section 3.2 of the PRCP. The Graymont documents are provided in Appendix B.
PRCP Guideline Section 3.6	A hydrogeological assessment	A conceptual model of the groundwater hydrological system was developed based n the information in Section 3.1.5 and is presented in Section 3.5.1.
	A soil assessment	An assessment of the quality of stockpiled topsoils to be used in rehabilitation and any limitation f amelioration required is provided in Section 3.5.3
	A mine waste characterisation report	No waste characterisation has been provided. There are no mine waste landforms at Marmor and all missed solids process wastes are to be removed from site as part of the closure plan. Waste characterisation will therefore be conducted specifically for the purposes of

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		removal and appropriate disposal during rehabilitation and closure works. This is explained in Section 3.5.4
	A description of water management	This is provided in Section 3.5.7
	A revegetation plan	This is provided in section 3.5.9
	A void closure plan	This is provided in Section 3.6.11 and supported by a report in Appendix F
	A description of infrastructure that will be decommissioned and the methods for decommissioning The disturbance type of 'infrastructure' in the proposed PRC plan is too broad and will need to be further refined to adequately describe the decommissioning method for each infrastructure type. the proposed PRC plan and PRCP schedule conflict as to whether or not infrastructure will be retained by the landholder after closure. If infrastructure is to remain a landholder statement will need to be provided.	A further breakdown of the disturbance domains has been provided in Section 3.1.11. Details of decommissioning is provided in Section 3.5.13. No assets are to be retained and no landholder agreement is required.
	If infrastructure is to remain the responsibility of the landholder after closure then ongoing maintenance requirements should be identified	The PRCP rehabilitation objectives have been amended to clarify that no infrastructure is to remain at the site following closure (refer to Sections 3.3.2 and 3.6.13)
PRCP Guideline Section 3.7	The risk assessment provided does not comply with the PRCP guideline requirements, it should consider the risk of not achieving a stable condition as defined by section 111A of the Environmental Protection Act 1994 and should include additional detail on risk treatment.	The risk assessment in Section 3.6 has been updated to address stability risk and provides details of risk treatments described elsewhere in the PRCP.
PRCP Guideline Section 3.8	A rehabilitation monitoring and maintenance program	A Rehabilitation and maintenance program is provided in Section 3.7
PRCP Guideline Section 4	More specific rehabilitation milestones. These should be tailored to each rehabilitation area and be further broken down for the infrastructure rehabilitation area. Specific and measurable completion criteria for each rehabilitation milestone Measurable completion criteria for achieving a stable condition as well as the PMLU.	The rehabilitation milestones have been amended to make them more specific to individual Rehabilitation Areas (see Section 3.3.2)
	The PRCP schedule should include QA/QC steps in the milestone criteria	Inspection and Test Plans (ITPs) have been provided in Appendix E and discussed in Section 3.5.10